

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California public
benefit corporation; LAURA CHAMBERS and
her marital community; WINIFRED MITCHELL
BAKER and her marital community, and DANI
CHEHAK and her marital community.

Defendants.

Case No. 2:24-cv-1032-RAJ

**NOTICE OF ERRATA RE:
DEFENDANTS MOZILLA
CORPORATION a.k.a M.F.
TECHNOLOGIES, LAURA
CHAMBERS, AND DANI CHEHAK'S
REPLY IN SUPPORT OF MOTION
TO CONTINUE TRIAL DATE AND
AMEND CASE SCHEDULE**

PLEASE TAKE NOTICE that Defendant Mozilla Corporation ("Mozilla,") Laura Chambers, and Dani Chehak (collectively, "Defendants") respectfully submit this Notice of Errata regarding Defendants' Reply in support of the Motion to Continue Trial Date and Amend Case Schedule (Dkt. 57), filed on May 16, 2025 ("Reply"), to make a correction to the Reply.

The Reply erroneously included the following sentence: "Plaintiff's complaints also ring hollow given that it took him *over nine months* to finally make less than a tenth of the volume of production in response to Defendants' initial document demands." The sentence should be deleted and replaced with the following sentence: "Plaintiff's complaints also ring hollow given that it took him *over seven months* to finally make less than a tenth of the volume of production in response to Defendants' initial document demands."

1 Additionally, the Reply erroneously included the following sentence: “By contrast, it took
2 Plaintiff until April 25, 2025 to complete his production of just 1,038 pages in response to
3 Defendants’ requests served *in July 2024*. *Id.* ¶ 15. It is striking that Plaintiff can complain of delay
4 and lack of diligence when it took him *nine months* to make that production.” The sentence should
5 be deleted and replaced with the following sentence: “By contrast, it took Plaintiff until April 25,
6 2025 to complete his production of just 1,038 pages in response to Defendants’ requests served *in*
7 *September 2024*. *Id.* ¶ 15. It is striking that Plaintiff can complain of delay and lack of diligence
8 when it took him *seven months* to make that production.”

9 Lastly, the Reply erroneously included the following sentence: “Plaintiff’s claim that
10 Defendants should have known about the need to take additional discovery rings hollow given that
11 Plaintiff only completed his document production in response to Defendants initial discovery
12 requests served nearly a year ago.” The sentence should be deleted and replaced with the following
13 sentence: “Plaintiff’s claim that Defendants should have known about the need to take additional
14 discovery rings hollow given that Plaintiff only completed his document production in response to
15 Defendants initial discovery requests served over seven months ago.”

16 A courtesy copy of the corrected Reply is attached hereto as Exhibit A for the convenience
17 of the Court and all counsel. The first change is on page 1, lines 22-24, the second change is on
18 page 3, lines 13-16, and the third change is on page 7, lines 15-18. No other changes to the
19 response were made.
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1 Dated this 19th day of May, 2025.

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TECHNOLOGIES, LAURA CHAMBERS,

and DANI CHEHAK

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties or their counsel of record.

Dated this 19th day of May, 2025.

s/ Jacey Bittle

Jacey Bittle, Legal Executive Assistant